

Scope of Work

Preparation of an Environmental Assessment/Environmental Impact Evaluation
Old Farms Road and Thompson Road Improvements
Avon, Connecticut
State Project No. 04-129

Submitted by:
C&C Consulting Engineers, LLC
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A..GENERAL PROJECT UNDERSTANDING

The Federal Highway Administration (FHWA), as lead federal agency for this project, has finalized the Purpose and Need statement in their letter dated August 13, 2009 as follows: "The Purpose and Need of this project is to provide transportation improvements to (1) address operational and safety needs in the Old Farms Road/Thompson Road/Scoville Road corridor in Avon, Connecticut, and (2) support land use objectives established in the Town's current approved Plan of Conservation and Development adopted on May 2, 2006.

The Other Goals and Objectives for this project are as follows:

- Improve vehicular traffic safety through this area in the Town of Avon;
- Take into consideration the long range needs of the AvonOldFarmsSchool;
- Protect wetlands and other aquatic resources;
- Preserve an open space and wildlife corridor and link existing open space along the FarmingtonRiver with other corridors to the west and southwest;
- Improve a significant local road regional transportation link across the FarmingtonRiver which connects the FarmingtonValley (west of the project limits) to the Greater Hartford area (east of the project limits).
- Minimize fragmentation of forest habitat and segmentation of stream corridors."

This scope of work document describes the work that will be completed to develop a joint Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) and Environmental Impact Evaluation (EIE) per the Connecticut Environmental Policy Act (CEPA) for the Old Farms Road and Thompson Road Improvements in Avon, CT. This EA/EIS will be prepared in accordance with the requirements of the National Environmental Policy Act (NEPA)

(23 U.S.C. 109 (h)), the Council on Environmental Quality (CEQ), Regulations for implementing NEPA (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771), the Connecticut Environmental Policy Act, (CEPA) pursuant to the Regulations of the Connecticut State Agencies, Section 22a-1a-1 through 12 inclusive and following the guidelines given in FHWA Technical Advisory (76640.8A). The preparation of the EA/EIE will provide updated information for project alternatives evaluated in the November 2007 Draft EA and will also include an evaluation for an expanded range of relocation alternatives developed by the Town of Avon (TOA) to advance the EA/EIE for the project.

The preparation of the EA/EIE will be performed in accordance with a determination by the FHWA that this project is appropriate for an EA/EIE process. The EA/EIE will provide information and perform evaluations to determine positive and negative impacts for a No Build alternative and other project alternatives under consideration that address the project's Purpose and Need. Preparation of an EA/EIE will provide FHWA with sufficient information to determine if a Finding of No Significant Impact (FONSI) is applicable. The information provided in the EA/EIE will be submitted to FHWA and the Connecticut Department of Transportation (CTDOT) in compliance with NEPA and CEPA; and will serve as a substantial part of the documentation required by reviewing, permitting and funding agencies.

This EA/EIE process is intended to achieve timely and efficient identification, evaluation and assessment of environmental impacts and regulatory issues. This process will include public involvement, stakeholders, including Avon Old Farms School, Federal and Connecticut State agency participation for review and comment on project alternatives under consideration during completion of the Draft and Final EA/EIE.

B..PROJECT HISTORY

The development of this project included early planning stages, agency involvement, public and agency meetings, and acquisition of Open Space, multi-use trails, and partnerships with AvonOldFarmsSchool. This important history will be summarized in the EA/EIE document which will also include a description of the History of Environmental Streamlining and NEPA Executive Order 13274 SAFETEA-LU and TEA-21 applicable to the EA.

The TOA has two (2) other additional roadway projects currently in final design and scheduled for construction in 2014, which are adjacent to the Avon Old Farms/Thompson Road Improvement Project. The first project, 04-116, Old Farms Bridge Replacement and Reconstruction of Old Farms Road, constitutes the eastern project limits on Old Farms Road of this project, just west of Tillotson Road. The bridge replacement over Farmington River and reconstruction of Old Farms Road does not affect the alignment of this project on Old Farms Road. The second project is Project 04-118, which consists of improvements to Route 10/Old Farms Road intersection that connects to the eastern limits of Project 04-116. Since the Old Farms Road/Thompson Road Improvement Project connects to Project 04-116 on the existing alignment of Old Farms Road, these two projects are independent from the Avon Old Farms

Road/Thompson Road Improvement Project; however, they are an important part of the overall regional transportation system and need to be considered in this EA/EIE Impact Evaluation. These two projects will be addressed in the section 4.25 – Cumulative, Secondary and Indirect Impacts, as well as other sections of the EA/EIE as may be appropriate.

NEPA

The potential environmental consequences for improvement alternatives were evaluated in several drafts developed during the 20+ year history of this project. However, these documents are now out of date and no approved Federal Environmental document exists for this project. FHWA has stated that EA/EIE is required since Federal funding has been authorized for the project. As such, existing natural, cultural, and physical environmental conditions in the project study area will need to be updated, and impact analyses will need to be re-visited for each project alternative as defined in this scope of work in order to produce a new EA document that satisfies Federal NEPA requirements.

CEPA

Similarly, no State EIE was approved for this project. The draft EA documents previously developed for this project are out of date and did not fully satisfy the requirements of CEPA. As such, a notice of scoping was posted in Connecticut's Environmental Monitor and the CEPA process must be followed per state regulations. Substantial modification, re-organization, and updating of existing environmental data and a re-evaluation of alternative impacts will be necessary in order to satisfy CEPA requirements and obtain approval from the Connecticut Office of Policy and Management (CT OPM). This EA/EIE will be prepared pursuant to the Regulations of the Connecticut State Agencies Sections 22a-1a-1 through 12 inclusive.

C..PROJECT ROLES

C&C Consulting Engineers, LLC (C&C) will provide consulting services to manage the preparation of the EA/EIE. C&C will also be responsible for preparing certain technical sections, assembling the EA/EIE, and providing technical services to the TOA. C&C will be supported by the sub-consultant firms of **Environmental Planning Services (EPS)**, **Marc L. Banks, Ph.D., LLC (MLB)** and **Fitzgerald and Halliday (FHI)**. In addition to those sub consultants, **CTDOT** and the **TOA** will prepare updated information for documentation and technical report requirements to be included in the EA/EIE.

Note that initials of each team member shown in the next Section D Scope Tasks are intended to identify the "lead author" for that specific subtask; it shall be understood that other team entities will also contribute to the subtask work product as may be necessary and assigned by C&C.

D..SCOPE TASKS

Task 1.0 Conduct Project Kickoff and Scoping

Subtask 1.1 Prepare Work Plan

C&C will prepare the draft work plan to include an overall project schedule and detailed task list with a clear assignment of responsibilities. The plan will cover all NEPA/CEPA process logistics; including data collection and fieldwork; impact assessment and document preparation; agency outreach and coordination; public hearing coordination and conduct; response to comments; and those additional steps required to complete the NEPA/CEPA process.

Subtask 1.2 Conduct Kickoff Meeting

C&C, EPS, MLB and the TOA will attend a kickoff-coordination meeting with staff from CTDOT and FHWA to review the draft work plan for the NEPA/CEPA process and other agencies involved in the Review of the Draft and Final EA/EIE process. It is assumed that CTDOT and FHWA will agree to specific time frames for review of draft NEPA/CEPA documents at this meeting, which will be critical to expedite the NEPA process for this project.

Subtask 1.3 Edit and Distribute Work Plan

C&C will prepare edits to the work plan as discussed and agreed to at the Kickoff Meeting. The revised work plan will be distributed to all as the framework for project collaboration going forward.

Subtask 1.4 CEPA Scoping Notice (Required)

CTDOT will conduct all scoping activities. Comments received by CTDOT during the scoping period will be transferred to C&C, for consideration in the EA/EIE.

Task 2.0 Confirm Project Purpose and Need

FHWA, in consultation with CTDOT and the Town of Avon, has established the Purpose and Need statement for this project as follows:

"The Purpose and Need of this project is to provide transportation improvements to (1) address operational and safety needs in the Old Farms Road/Thompson Road/Scoville Road corridor in Avon, Connecticut, and (2) support land use objectives established in the Town of Avon's current approved Plan of Conservation and Development adopted on May 2, 2006.

The Other Goals and Objectives for this project are as follows:

- *Improve vehicular traffic safety through this area in the Town of Avon;*
- *Take into consideration the long range needs of the Avon Old Farms School;*
- *Protect wetlands and other aquatic resources;*
- *Preserve an open space and wildlife corridor and link existing open space along the Farmington River with other corridors to the west and southwest;*
- *Improve a significant local road regional transportation link across the Farmington River which connects the Farmington Valley (west of the project limits) to the Greater Hartford area (east of the project limits).*
- *Minimize fragmentation of forest habitat and segmentation of stream corridors."*

This scope of work assumes the statement of purpose and need will not change, and the establishing documentation shall be incorporated into the EA/EIE.

Task 3.0 Prepare the Description of the Project and Alternatives

Subtask 3.1 Describe the Proposed Alternative

C&C will prepare this definition of the location, length, termini, access control, proposed improvements, etc. of the Proposed Alternative.

Subtask 3.2 Describe the Project Alternatives

C&C will prepare the detailed descriptions of the project alternatives investigated to address the project's purpose and need. The No Build Alternative, the alternatives considered but dispensed, and the alternatives to be analyzed with further detailed study will be discussed under these respective categories. Each alternative description will be illustrated using plans, maps or other visual aids for cultural, natural resource and planning impacts (for which MLB, FHI and EPS are responsible).

- **No Build Alternative-** This section will discuss what the corridor would be like in the future without the proposed changes. This will include a discussion of the No Build Alternative as a base line condition.
- **Alternatives Considered but Dispensed--** This section will provide a brief overview of the other project alternatives considered, but dispensed, and the reasons they were dispensed without further detailed study (Alternatives A, B, C, D, G).
- **Alternatives Analyzed with Detailed Study (Including Proposed Alternative)--** This section will discuss what the corridor would be like in the future with the proposed changes on five (5) project alternatives to be analyzed with further detailed study (Alternatives E, F, H, I, L).

Task 4.0 Analyze Impacts of Alternatives

This task will determine and describe the existing socioeconomic, cultural, natural and physical environments in the project corridor and the associated impacts of the five project alternatives (E, F, H, I, L) selected for detailed study.

Subtask 4.1 Land Use, Zoning, and Local and Regional Plan of Conservation and Development

FHI will characterize the existing land uses in the project area. FHI will also review the current TOA Comprehensive Plan, Avon Old Farms School Master Plan of Development, proposed Property Transfer from Avon Old Farms School to the TOA, and the Avon zoning ordinance as it affects the project area. Impacts on future land uses from each project alternative will be described and will be evaluated in terms of changes from existing land uses, changes in property access, cumulative impacts of change to land use, impacts to predominant land use patterns in the context of community policy, and consistency with zoning.

Subtask 4.2 Right of Way

C&C will document potential land acquisitions and business displacements associated with the project alternatives. The associated acquisition costs and impact to the local tax base will be estimated based on available Town of Avon assessment data. In the case of partial acquisitions, the amount of acreage impacted and any associated impacts to the use of the partially impacted properties will be documented. C&C will describe the impacts when housing or businesses must be relocated to accommodate each proposed alternative according to the Uniform Relocation Assistance and Real Properties Acquisition Policy Act of 1970, which will include how many homes and/or businesses will be impacted.

C&C will describe the results from a site visit conducted to determine the number of homes, businesses, and properties that will be affected by the project by Right-of-Way needs. Open space reserved for conservation or access restriction will also be discussed. Plans will be developed to a sufficient stage to estimate the amount of land being acquired for new right-of-way.

Subtask 4.3 Consistency with State Plan of Conservation and Development

FHI will review the *Conservation and Development Policies Plan for Connecticut* (2005-2010) to identify and describe the current designation of the project study

area according to the plan. The consistency of the Proposed Action with the State plan will be assessed. If the Proposed Action is found to be inconsistent with policies and plans expressed in the State plan, this divergence will be noted in the document and suggestions for future coordination activities presented.

Subtask 4.4 Community Cohesion

FHI will describe how the project alternatives may impact communities and/or specific neighborhoods, including impacts on cohesion due directly to the proposed improvements (i.e., bisecting a neighborhood or campus). FHI will also consider potential cohesion impacts as a result of changes in travel patterns, accessibility, and public safety.

FHI will discuss how the project alternatives will potentially impact churches and schools, including the operation and future growth of Avon Old Farms School.

Subtask 4.5 Environmental Justice

FHI will undertake an environmental justice assessment consistent with and in compliance with Federal Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. An environmental justice population area is defined by the USDOT as one in which there is a concentration of either low income or minority individuals as compared with a larger geographic region. FHI will obtain 2010 Census data by Block Group and/or Tract for the study area and will identify concentrations of environmental justice populations in the study area, in relation to the larger geographic area. Potential impacts to those populations from each of the project alternatives will be described assuming that Environmental Justice populations existing in the project study area. The assessment of impacts to identified Environmental Justice populations will be based on consideration of the following, as relevant:

- a) Traffic related safety reduced for target population area
- b) Qualitative estimate of air and noise impact potential
- c) Destruction or disruption of natural or cultural resources
- d) Destruction or loss of aesthetic values
- e) Destruction or disruption of community cohesion
- f) Destruction or disruption of community economic vitality
- g) Destruction or disruption of availability of facilities and services
- h) Adverse employment effects (impacts to journey to work)
- i) Increased traffic congestion
- j) Isolation (access to and from the target population area is more circuitous or cut-off)
- k) Denial or reduction in receipt of benefits (will access to benefits of the alternative be denied or reduced for the target population area).

Mitigation measures to address potential impacts will be identified as appropriate. The consultant will coordinate with the Capital Region Council of Governments to ensure that the analysis meets their environmental justice analysis guidelines.

Subtask 4.6 Economic

This section will be prepared by C&C and provide a narrative summary for the project alternatives for each of the following assessments:

- a) Impacts on the regional and/or local economy such as development, tax revenues, employment opportunities
- b) Impacts on the vitality of existing highway-related businesses (i.e., gas stations, motels)
- c) Impacts on established business districts (i.e., impact to a downtown resulting from building a bypass)
- d) Tax consequences of the proposed project, which include both removal of lands from the tax rolls (and what financial loss to specific taxing bodies would be), as well as discussion of impacts resulting from induced growth; and
- e) An estimated number of jobs lost and the effects on any existing local area businesses that are not relocated.
- f) Impacts relevant to emergency response, property damage resulting from accidents.

Subtask 4.7 Joint Development

FHI will describe current and proposed facilities, such as trails and parks, which can be developed or planned as a result of each of the five project alternatives. Areas reserved as Open Space and Conservation will also be described.

Subtask 4.8 Public Recreational Areas/Section 4(f) and Section 6(f) Properties

FHI will identify public and privately owned parks and recreation areas located within the project study area and will define each park in terms of its size, use, function, access, and/or other relevant features that could be affected by the proposed project alternatives. Public parks are protected under Section 4(f) of the US Department of Transportation Act of 1966. If Section 4(f) parklands are potentially impacted by the project, then preparation of a stand-alone Section 4(f) Evaluation would be required for this project. FHI will also identify whether other potential Section 4(f) resources may be present in the study area, such as historic properties listed on or eligible for the National Register. In addition, FHI will screen the study area for Section 6(f) properties; land that was either bought

or improved with Land and Water Conservation Act (LWCA) funds. The presence of Section 6(f) lands will be determined through contact with the Connecticut Department of Energy and Environmental Protection (CTDEEP) and the Town of Avon and impacts to them will be described for each alternative.

Subtask 4.9 Considerations Related to Bicyclists and Pedestrians

FHI will describe and illustrate current pedestrian or bicycle facilities in the project area, and the potential impacts (positive and negative) for the five project alternatives.

Subtask 4.10 Transportation

C&C will discuss positive or negative impacts of each of the five project alternatives to all modes of transportation. This could include: rail, air, or other forms of public or freight transit.

Subtask 4.11 Historical Sites, Districts & Archeological Sites

Marc L. Banks, Ph.D., LLC (MLB) will describe Historical Sites or Districts and Archeological Sites in the project area, and the potential impacts (positive or negative) or mitigation avoidance for the project alternatives requiring adjustment. MLB will perform a Phase 1 survey for project alternative locations not previously part of the November 2007 Draft EA. No additional new Phase II Study is included in this scope of work beyond existing work previously completed by others. SHPO/THPO determinations previously provided to the Town of Avon or addressed in the November 2007 Draft EA will be included in these sections.

MLB will discuss project alternatives impacts to human remains. There are several laws and statutes that protect established cemeteries and human remains.

Subtask 4.12 Wetlands & Watercourses

EPS is aware of the July 2010 Compensatory Mitigation Guidance document issued by the US Army Corps of Engineers New England District. This represents New England District policy and incorporates the requirements of the following documents:

1. Compensatory Mitigation for Losses of Aquatic Resources; Final Rule 4/10/08; 33CFR Parts 325 and 332 ("Mitigation Rule")
2. Regulatory Guidance Letter 08-03: Minimum Monitoring Requirements for Compensatory Mitigation Projects Involving the Restoration, Establishment and/or Enhancement of Aquatic Resources

EPS will be responsible for the following:

- a) Delineate wetlands per CT and federal criteria and prepare a revised wetland delineation report reflecting this effort.
- b) Estimate impacted wetland acreage by wetland type for the proposed alternative (including wetland mapping).
- c) A qualitative impact discussion for each wetland area focusing on aquatic resources and upland buffers
- d) Estimate and describe the impacts to wetland functions and values for each alternative and wetland type.
- e) Provide a unique identifier for each wetland in the project area and in the immediate vicinity of the project area.
- f) Brief description of characteristics and Cowardin Classification of each wetland in the project area or in the immediate vicinity.
- g) Total approximate size of each wetland (acres) in the project area or in the immediate vicinity.
- h) Utilize the U.S. Army Corps of Engineers New England District (ACOE-NED) 2010 Compensatory Wetland Mitigation Guidance document, and the information generated above (wetland type, functions and values, and impact area), to estimate the suggested acres of compensatory wetland mitigation needed.
- i) Prepare an alternatives analysis for mitigation sites considered within the project area based on the determination of mitigation acreage required.
- j) If insufficient mitigation sites are available within the project area, the mitigation site alternatives analysis will expand to include other sites outside the project area, but within the same watershed.
- k) Identify the types of mitigation proposed in accordance with the 2010 USACE-NED guidance, giving priority in the following order: restoration, creation, enhancement, and preservation.
- l) Coordinate with regulators to obtain concurrence on results and proposed mitigation sites to be utilized.
- m) The total area of proposed mitigation to be provided and concepts will be explained with regards to how each mitigation concept fulfills current or most recent mitigation ratios in place.
- n) Discuss impacts of each alternative, including the efforts undertaken to avoid, minimize, and mitigate impacts to wetlands, including design variations considered to minimize wetlands impacts.
- o) Coordinate, prepare, and describe conceptual mitigation plans/package. The mitigation plan could include a combination of restoration, creation, enhancement, and preservation and will be developed to a level of detail that is deemed acceptable for a mitigated EA.
- p) Vernal Pool information will be updated and located to discuss impacts of the project alternatives.
- q) Stream and wetland Functions and Values

EPS will be responsible for the following:

- a) Identify and describe watercourses and drainage ways occurring in the project area, include Thompson Brook, Farmington River and Beaver Dam Pond, as well as intermittent watercourses that cross proposed alternatives. February 2011 CTDEEP Surface Water Quality Standards will be consulted.
- b) Describe surface water-quality impacts and groundwater sources in the project area, along with all applicable mitigation measures. Include public and agency concerns. Consult and refer to the 2004 CTDEEP Stormwater Quality Manual when describing management and treatment of project stormwater.
- c) Review and comment on conceptual Erosion and Sedimentation (E&S) plans. Consult and refer to the 2002 CTDEEP Erosion and Sedimentation Control Guidelines when discussing E&S controls to be used on the project.

C&C will contribute to a description of minimization and mitigation measures and locations for project alternatives. This will include assessment, for each alternative, of stormwater treatment and LID measures (e.g. primary treatment, sedimentation, etc.) that can be incorporated into the project scope.

Subtask 4.14 Wild and Scenic Rivers

EPS will be responsible for the following:

- a) Describe current status of Wild and Scenic River designation for lower Farmington River.
- b) Discuss impact of project alternatives on designation and on the River.

Subtask 4.15 Floodplains

EPS will coordinate this section with CTDOT to determine appropriate level of development for this section relevant to the following:

- a) Review current Federal Emergency Management Agency (FEMA) flood insurance maps (Recent Revisions)
- b) Federal EO
- c) Identify and describe floodplain limits.
- d) Describe impacts 100-year floodplain and floodways from the project alternatives. Impacts described in terms of area as well as fill volumes. If exact fill volumes are unknown than volumes will be estimated.
- e) Discuss areas subject to seasonal or regular flooding and how the project alternatives will be affected by traffic travel patterns and community cohesion.
- f) Present/describe mitigation options for each project alternative to offset loss of flood storage due to the placement of fill in the 100-year floodplain or floodway.

Subtask 4.16 Wildlife and Habitat

EPS will be responsible for the following:

Flora and Woodlands

- a) Botanist to conduct site visit to identify and map plant communities.
- b) Prepare list of common to dominant vegetation in project area.
- c) Identify any plant communities unique to the area or to one alternative.
- d) Discuss vegetation impacts of project alternatives
- e) EPS will describe prime and important woodlands and forest blocks in the project area.
- f) EPS will discuss the impacts of the alternatives on woodlands and forest blocks.

Fauna

- a) Vernal pools will be identified from a previous spring period and an additional spring period. Data will be collected for verification of vernal pool locations.
- b) Wildlife Biologist to conduct site visit to identify and map habitat units and corridors present.
- c) Prepare list of wildlife likely to use project area based on vegetation types and habitat units identified.
- d) Prepare a list of observed species within the project area and the habitat units were observed.
- e) Identify any habitat units unique to the area or to any one alternative.
- f) Discuss impacts to Fauna for each alternative
- g) Discuss potential noise impacts to fauna
- h) Discuss potential impacts to fauna due to fragmentation of habitat
- i) Discuss avoidance, minimization and mitigation measures relative to potential faunal impacts

Fisheries

- a) Coordinate with CTDEEP Fisheries to identify historic and current fish populations and habitat.
- b) Discuss impacts to fisheries as well as ways to minimize impact and/or mitigate unavoidable adverse impacts.

Subtask 4.17 Threatened and Endangered Species

EPS will conduct additional spring/summer 2011 biological surveys as noted by CT DEEP letter received by EPS to expedite data collection for the EA.

- a) Coordinate with USFWS and CTDEEP regarding known locations of state and U.S. listed species that may be present in the project corridor. The CTDEEP database will be used to identify listed species.
- b) Discuss the results and illustrate the results of this coordination.

- c) Discuss potential for listed species in corridor relative to unique habitats identified in 4.16 above.
- d) Discuss impacts of project alternatives on listed species.
- e) Targeted field surveys for individual species will not be conducted as part of this EA/EIE.
- f) Habitat types that typically support a large assemblage of listed species will be identified and mapped.

Subtask 4.18 Farmland Soils

EPS will be responsible for the following:

- a) Describe prime and important farmland soils in the project area.
- b) Discuss the impacts of the alternatives on these soils.
- c) Describe the impacts of alternatives to farmland soils in this section.

Subtask 4.19 Physical Impacts

C&C will insert narrative descriptions provided by CTDOT

- a) Traffic section narrative description will be provided by CTDOT.
- b) Noise section narrative description will be provided by CTDOT.
- c) Air Quality section narrative description will be provided by CTDOT.
- d) Mobile Source Air Toxics (MSATs) section narrative description will be provided by CTDOT.

Subtask 4.20 Public Safety and Health

C&C will insert these narrative descriptions provided by CTDOT.

- a) Public Safety -This section narrative description will be provided by CTDOT.
- b) Public Health -This section narrative description will be provided by CTDOT.
- c) Impacts relevant to emergency response, property damage resulting from accidents

Subtask 4.21 Energy

Energy consumption, both in project construction and as a result of the Proposed Alternative, will be addressed in the EA/EIE. C&C will describe how energy includes fossil fuels, labor, and highway construction materials. Unless reducing or minimizing energy consumption is a project goal, such as in mass transit or commuter travel enhancement projects, energy consumption is typically not a key decision-making criterion. Reducing energy consumption is generally a by-product of other transportation improvement goals, such as reducing congestion and improving travel times and level of service.

Subtask 4.22 Contaminated and Regulated Materials Sites

The information obtained by FHI from the Environmental Protection Agency (EPA) and CTDEEP will be discussed regarding Superfund listed sites, Resource Conservation and Recovery Act (RCRA) sites, and landfills within the project area. FHI will include information obtained from RCRA about registered large and small generators of hazardous waste. Verify the location of any underground storage tanks (UST) or leaking underground storage tanks (LUST) in the project area. List sites found through these searches and note their proximity to the project to determine potential impacts. A Phase I Environmental Site Assessment (ASTM 1527) will not be done concurrently with the EA/EIE process.

Brief summaries from available site information, the potential impact on the project alternatives to the site (relative to public health and other environmental concerns), and proposed mitigation measures to eliminate or minimize impacts or public health concerns will be discussed. No field investigation(s) will be performed for the EA/EIE. Existing Phase II technical reports within the project area may be included, if relevant to the project alternatives.

Subtask 4.23 Visual

The TOA will provide an assessment of the visual impacts of the project alternatives, including the “view from the road” and “view of the road.” This section will include, where relevant, the consideration given to design quality, art, park-like settings and architecture during project improvement planning.

Subtask 4.24 Utilities

C&C will discuss any impacts to both public and private utilities. This includes removal, relocation, and rehabilitation of water mains, sewer, electric poles, etc. Potential for service disruptions to area residents will be identified and described. Impacts to utility demand and capacity will also be evaluated for each alternative.

Subtask 4.25 Cumulative, Secondary and Indirect Impacts

FHI will prepare a cumulative, secondary and indirect impact analysis to determine potential impacts to resources discussed in the EA/EIE. This will provide a baseline to evaluate impacts for these future roadway improvement projects with the proposed Avon Old Farms and Thompson Road Improvement Project alternatives.

This section will provide the results of the Eleven Steps in Cumulative Analysis (CEQ, *Considering Cumulative Effects under the National Environmental Policy Act*, January 1997).

Secondary impacts are defined as reasonably foreseeable consequences to the environment induced by the project, but that occur either later in time or in a different location as the direct impacts. Potential secondary impacts associated with the Proposed Action will be identified qualitatively based on the findings of the impact analyses for all resource issue areas.

Indirect impacts of proposed project improvement alternatives will be discussed in accordance with guidance provided in the eight-step framework outlined in NCHRP Report 403 published in 1998.

Cumulative impacts are defined as the total impacts to environmental resources and/or socio-economic and transportation conditions which result from the incremental effects of the action when added to reasonably foreseeable future actions. For the cumulative impact analysis, consultation with the town, regional planning agency, and state will be undertaken to identify other planned development and infrastructure improvements associated with the proposed undertaking. The cumulative impact assessment will not assess the environmental impact associated with general development trends in the area. Potential cumulative impacts to the environment associated with the Proposed Action will be assessed qualitatively.

The cumulative analysis tasks will include data collection, impact analysis, agency meetings, and documentation. For roadway projects, the primary cumulative effects are associated with residential and commercial development and further other roadway construction; the trends and effects of these actions will be the primary focus of all stages of the analysis.

All direct, secondary and cumulative impacts will be addressed in accordance with the CWA Section 404(b)(1) Guidelines.

Data Collection: During the data collection phase of the secondary and cumulative impacts analysis, the overall parameters of the analysis will be defined. Steps will include:

- a) Summarizing the resources affected by the project, either directly or indirectly from the findings of the individual impact analyses for resources
- b) Defining and mapping the geographic area and establishing an appropriate time frame for the relevant resources and impacts identified, and concurrence of such by the Town of Avon and CTDOT
- c) Performing a qualitative land use/development trends assessment using the past and current time frames, to be used as a basis for predicting future development trends (includes evaluation of historic land use map, local planning documents, and census, socioeconomic, and building data)

- d) Characterizing the existing stresses on the affected resources and their capacity to absorb additional stress or impact.
- e) Conducting additional research regarding reasonably foreseeable future development-related actions that could affect the pertinent resources via contacting pertinent local, regional, and state agencies or officials
- f) Mapping the future land use based on the reasonably foreseeable future actions

Impact Analysis: The general steps will include:

- a) Identifying the important cause-and-effect relationships between the project activities and impacts to resources
- b) Determining the magnitude and significance of the effects over the relevant time frames, based on the resource characterizations from the data collection phase
- c) Identifying relevant mitigation measures, either those to be undertaken as project-specific actions or those evolving as general or regulatory tools
- d) Summarizing unmitigated adverse impacts and their significance

Agency Meetings Relative to Indirect and Cumulative Effects: FHI will conduct of up to two (2) meetings with local, state, and federal agency representatives to obtain input on the findings of the ICE analysis. Study results and maps will be prepared in handout form for use at these meetings.

Documentation: The methodology and results of this study will be incorporated in the main body of the EA and background information will be provided in an appendix if needed.

Section 4.26 Cost Benefit Analysis

As required by CEPA, the general costs associated with construction of the Proposed Action will be compared by FHI against the anticipated general economic impact of the Proposed Action on the local and regional economy. Cost and benefits will be described based upon employment generated by the project and a qualitative assessment of project indirect effects on the Town of Avon's economic vitality.

Subtask 4.27 Construction Impacts and Emergency Routes

All direct and secondary impacts associated with construction activities will be described in detail in this section compiled by C&C. FHI will describe potential impacts to air quality, noise, and other resources which may be affected by construction activities. EPS will be responsible for describing construction related impacts to wetlands, watercourses, surface waters, groundwater, water quality and wildlife.

C&C will develop a preliminary maintenance and protection of traffic plan for each of the five project alternatives involving existing roadways, road closures, increased traffic delays, and detours, making sure to include impacts to emergency access and routes

Subtask 4.28 Project Mitigation

EPS will prepare a comprehensive mitigation framework for the project, in coordination with all other consultants and the CTDOT. This section will include subsections that review each Environmental Resource listed and document the mitigation for that resource. It will correlate to the Mitigation Summary Table, Mitigation to Surface Water, Groundwater, and Water Quality. This section will also include a discussion of proposed concepts for mitigation that can be implemented, including cumulative and secondary impacts.

A comprehensive compensatory mitigation framework will be prepared describing the proposed mitigation measures for each impacted resource requiring mitigation measures. The framework will provide a clear and concise roadmap outlining the proposed mitigation measures to be provided and agreed upon through coordination with the regulatory agencies. Descriptive text, tables, and graphics may be used to portray the mitigation framework, as needed.

This scope of work does not include additional documentation or impact analysis efforts associated with changes in the project development program or design that may occur after the initial notice-to-proceed on this scope of work, and /or which may result from review comments.

Task 5.0 Prepare Base Mapping and Report Graphics

Under this task the base mapping of the project, alignment plans, and all report graphics will be prepared, in color, unless specifically requested by the TOA to be in black and white. Graphics will be used where necessary to illustrate the affected environment and potential project impacts to environmental resources. Each Alternative and No Build Figure will include locations of Wetlands, Flood Plain, Critical Terrestrial Habitat (i.e. Vernal Pools), and Historic Sites for

general reference and proximity to each alternative. A typical roadway cross-section Figure for Urban Collector and Rural Collector Alternatives for 45 MPH Design will be provided.

Subtask 5.1 Assignment of Graphics

Consistent with the division of responsibilities on the EA/EIE effort, the assignment of graphics' responsibilities shall conform to the following:

- a) The TOA will provide all Survey and Project Area Base Mapping for the EA/EIE; this will include Centerline Alignments to be field located at 50 foot stations in the field; also include all necessary field locations of flagged wetlands and identified historic sites; and any additional ground elevations will be obtained as required;
- b) CTDOT will provide Tables, Plans, and Supporting Graphics for traffic analyses, noise analyses, and air quality analyses;
- c) FHI will prepare figures, tables and graphics for tasks 4.1, 4.3, 4.4, 4.5, 4.7, 4.8, 4.9, 4.22, 4.25, 4.26, and pertinent aspects of tasks 4.27 and 4.28;
- d) EPS will prepare figures, tables and graphics for the tasks 4.12 through 4.18, task 4.28 and pertinent aspects of tasks 4.25 and 4.27;
- e) MLB will prepare figures, tables and graphics for tasks 4.11 , and pertinent aspects of tasks 4.14 and 4.28;
- f) C&C will review, coordinate, and assemble figures, tables and graphics prepared by the above.

Subtask 5.2 Preparation of Tables

C&C will prepare tables for the Streamlined Resource Summary, the Summary of Impacts for No Build and Alternatives Studied in Detail, and the Early Agency Coordination Responses. C&C will also prepare figures for typical roadway cross section for each of the Urban Collector and Rural Collector alternatives, based upon a 45 MPH design speed.

Task 6.0 Prepare EA/EIE and Respond to Reviews

Subtask 6.1 Prepare Technical Reports

Prepare Technical Reports for the No Build Alternative, and Alternatives E, F, H, I and L, to be referenced in the EA/EIE impacts text narrative. These reports will be prepared individually as separate documents based on detailed study, and copy will be included in the EA/EIE appendix.

- a) Traffic Report for will be provided by CTDOT;
- b) Air Quality Report will be provided by CTDOT;
- c) Archeological Assessment Report will be provided by MLB;
- d) Noise Analysis Report will be provided by CTDOT;
- e) Wetlands and Watercourses/Biodiversity Report will be provided by EPS;
- f) Cost Estimate (Planning Level) Report will be provided by C&C;
- g) Project Design Criteria will be provided by C&C and the TOA

- h) The Design Report by the TOA will provide – plan, profiles for 45 mph design speed for all alternate alignments; approximate cut and fill will be shown on the plan view; earth quantity will be developed for use in the planning cost estimate; preliminary structure type for brook crossings at 40-scale will be developed; landscaping treatments will be recommended; preliminary drainage layouts showing drainage watershed, inlets and outlets will be developed.
- i) The TOA will also provide the design standards for Multi-Use Trail System, including typical cross sections along with approximate plan location for the trail work.

Subtask 6.2 Review of Technical Reports by Others
C&C will review those Technical Reports prepared by others.

Subtask 6.3 Prepare the Draft EA/EIE Document

- a) The draft EA /EIE will be prepared in compliance with the requirements of the National Environmental Policy Act (NEPA) (23 U.S.C.109 (h)), the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771) the Connecticut Environmental Policy Act, (CEPA) pursuant to the Regulations of the Connecticut State Agencies, Section 22a-1a-1 through 12 inclusive and following the guidelines given in FHWA Technical Advisory T6640.8A. The proposed project roadway relocation alternatives will be the focus of the EA/EIE.
- b) Available Geographic Information System (GIS) data-base resource information within the project area will be utilized for project alternatives' environmental assessment. The natural resources analysis will utilize relevant information that may be contained in the November 2007 Draft EA document to the extent that selected information has been field-validated or is still current. Likewise, cultural resources that were identified in Phase I and Phase II Archaeological survey reports for previous roadway location alternatives will be supplemented with Archeological Assessment and Reconnaissance to determine if any additional Phase I survey is required for new relocation alternatives. The FHWA EA format will be followed.
- c) Principal authors of the various sections of the EA/EIE are indicated on the Table of Contents appearing later in this task description, and are consistent with the respective responsibilities listed in the subtask descriptions under Task 4. In addition to authoring sections where indicated, C&C will coordinate the preparation of the EA with the TOA, CTDOT, FHI, EPS and MLB. C&C will review and insert narrative text and tables into each section of the EA prepared by the TOA, FHI, EPS, MLB and CTDOT.

- d) Resources not discussed in the body of the EA/EIE are to be located in the Streamlined Resources Summary, Appendix A. The summary will include information about the resources, the method used to evaluate the resources, and when the evaluation was completed. This section will be prepared jointly by C&C, FHI, EPS and MLB and will include a Resources Summary Table comparing the impact of the project alternatives discussed in the EA/EIE with the No Build Alternative.
- e) A section of the draft document will be devoted to the 4(f) Evaluation. This section will be prepared by C&C, FHI, EPS and MLB and will describe the Section 4(f) resources (Park Lands, Bicycle & Pedestrian, Historical Sites/Archeological, Wildlife and Habitat) affected by the project alternatives. It also will discuss measures that have been taken to avoid the resources, and measures that have been suggested by the CT State Historic Preservation Office (SHPO) to minimize and mitigate harm.
- f) Another section of the document presenting the Disposition of the project will be prepared by C&C, FHI, EPS and MLB and will inform the reader of the status of the EA/EIE process and whether the next appropriate step should be to prepare an EIS or a FONSI. The following paragraph should be used if the project will have no impacts:

“This EA/EIE concludes that the proposed project action is necessary for safe and efficient travel within the project corridor and that the proposed project action meets the purpose and need. The Proposed Action will have no significant adverse social, economic, or environmental impacts of a level that would warrant an environmental impact statement. The proposed selection will occur following completion of the public review period and public hearing.” This section of the EA/EIE will also include a description of major permits related to the Proposed Action and NEPA. This section will include the STIP/TIP status.
- g) In the final text section, a subsection for Agency Coordination will describe early coordination efforts, include a list of all federal, state, local, and tribal agencies contacted as part of early coordination, and indicate which agencies responded. Included will be early coordination response letters in Appendix B. This section will summarize any important issues discussed in these letters and address the comments in the EA/EIE. Also included will be early coordination efforts completed by the MPO/TMA to satisfy NEPA and Transportation Planning (23 CFR 450.212 and 450.318) requirements.
- h) Also in the final text section, discussion of Public Involvement will include a brief summary of public comments and concerns generated as part of any public information meetings which should be included, with dates and locations indicating where the meetings were held.

The following Table of Contents will be the basis for formatting and providing information to be included in the EA/EIE; “lead authors” are in parentheses.

Table of Contents

- Description of the Proposed Alternative (C&C)
- Project History (TOA)
- Purpose and Need for Action (C&C)
- Alternatives (C&C)
 - No Build Alternative
 - Alternatives (A,B,C,D,G) Considered for Environmental Impacts discussion and reasons for being dispensed without further detailed study
 - Alternatives (E,F,H,I,L) Impacts Evaluation with detailed study
- Impacts
 - Socioeconomic Impacts
 - Land Use, Zoning, and Local and Regional Development Plans (FHI)
 - Right of Way (C&C)
 - Consistency with State Plan of Conservation and Development (FHI)
 - Community Cohesion (FHI)
 - Environmental Justice (FHI)
 - Economic (C&C)
 - Joint Development (FHI)
 - Public Recreational Areas/Section 4(f) and Section 6(f) Properties (FHI)
 - Considerations Related to Bicyclist and Pedestrians(FHI)
 - Transportation (C&C)
 - Cultural Impacts
 - Historical Sites or Districts (MLB)
 - Archeological sites (MLB)
 - Natural Environment Impacts
 - Wetlands (EPS)
 - Surface Waters and Water Quality (EPS)
 - Wild and Scenic rivers (EPS)
 - Floodplains (EPS)
 - Wildlife and Habitat (EPS)
 - Threatened and Endangered Species (EPS)
 - Farmland Soils (EPS)
 - Physical impacts (C&C from CTDOT)
 - Traffic (CTDOT)
 - Noise (CTDOT)
 - Air Quality (CTDOT)
 - Mobile Source Air Toxics (MSAT's) (CTDOT)

- Public Safety and Health (CTDOT)
 - Energy (C&C)
 - Contaminated and Regulated Materials Sites (FHI)
 - Visual (TOA)
 - Utilities (C&C)
 - Cumulative, Secondary and Indirect Impacts (FHI)
 - Cost-Benefit Analysis (FHI)
 - Construction Impacts and Emergency Routes (C&C)
 - Project Mitigation (EPS)
- Section 4(f) Evaluation (FHI)
- Disposition (C&C)
- Comments and Coordination
 - Agency Coordination (C&C)
 - Public Involvement (FHI)
- Appendices
 - Streamlined Resources Summary (C&C)
 - Technical Reports
 - Traffic Report (CTDOT)
 - Air Quality Report (CTDOT)
 - Archeological Assessment Report (MLB)
 - Noise Analysis Report (CTDOT)
 - Wetlands & Watercourses/Biodiversity Report (EPS)
 - Cost Estimate (Planning Level) Report (C&C)
 - Project Design Criteria
 - Roadway geometrics (C&C)
 - Stormwater management (C&C)
 - Preliminary hydraulics at storm crossing/include recommended structure type (C&C)
 - Preliminary landscaping plan (C&C)
 - Aesthetic treatment for highway appurtenances. (C&C)
- Figures
- Tables

Subtask 6.4 Prepare the Administrative and Final Draft EA/EIE

- a) C&C will provide the TOA with five (5) copies of a working draft EA/EIE for review and comment. It is assumed that the TOA will compile internal agency comments (inclusive of CTDOT) and provide them to C&C. Based upon those comments, C&C will edit the working draft EA/EIE and provide the TOA with a Revised Working Draft for review and comment. It is assumed that the TOA will compile internal agency comments (inclusive of CTDOT) and provide them to C&C for incorporation into an Administrative

Draft EA/EIE. Five (5) copies of the Administrative Draft will be submitted to the TOA. Upon approval of the Administrative Draft EA/EIE by the TOA, CTDOT and FHWA, C&C will provide up to fifty (50) copies of the EA/EIE for Town, CTDOT and FHWA signature and public/agency distribution per NEPA and CEPA requirements.

- b) It is assumed that CTDOT will notice the availability of the EA/EIE in the Environmental Monitor and coordinate the document distribution, pursuant to NEPA and CEPA requirements.
- c) This scope of work does not include additional documentation or impact analysis efforts associated with changes in the project development program or design that may occur after the initial notice-to-proceed on this scope of work, and /or which may result from review comments.
- d) C&C will provide reports in both printed and digital format. Digital formats shall be: MS Word (.doc) or Adobe Acrobat (.pdf); tables in MS Word (.doc) or MS Excel (.xls); graphics in jpg or Adobe Acrobat (.pdf).

Subtask 6.5 Respond to Public and Agency Comments; Prepare the Record of Decision and the Final EA/EIE

- a) Upon completion of the EA/EIE circulation and review process, CTDOT will provide C&C with the comments received. C&C will coordinate with the TOA to determine the approach to be taken relative to the comments received, and will then follow that approach in preparing responses to substantive comments received. This task includes editing and amending the document, if warranted by substantive comments, provided the modifications are within the realm of the technical content defined within this scope of work. The draft responses and text modifications, if necessary, will be submitted to the TOA, CTDOT, and FHWA for review and concurrence prior to finalizing the EA/EIE. It is assumed that CTDOT will compile and provide the TOA and C&C with internal agency comments on the responses to comments and any EA/EIE text modifications. One round of review and comment is included in this scope.
- b) Following receipt of these comments, C&C will prepare and supply the Town of Avon with up to five (5) copies of the Final EA/EIE. C&C will also prepare a Draft Record of Decision (ROD/FONSI) and submit it to the Town of Avon and CTDOT for review. C&C will make one round of revisions to the ROD based on comments from the Town of Avon and CTDOT, and will submit the final ROD to the Town of Avon and CTDOT.

- c) It is assumed that CTDOT will be responsible for the necessary submissions to the Connecticut Office of Policy and Management (OPM) for a determination of adequacy as described in RCSA Sec. 22a-1a-9. Upon approval of this document by OPM and at the request of the TOA and CTDOT, C&C will provide up to twenty five (25) copies of the approved final document. C&C shall also provide an unbound copy of the document, suitable for reproduction of additional copies by the Town of Avon and CTDOT, plus digital files of all the text, figures, and graphics.

This scope does not include efforts in response to comments that seek further impact analysis in areas or issues outside the originally identified study area/scope or beyond the originally defined level of analysis. This scope also does not include additional documentation or impact analysis associated with changes in the project development program or design that may result from comments (from within the TOA, CTDOT, another agency, or the public).

In addition, this scope does not include activities involving the preparation or noticing of a Finding of No Significant Impact (FONSI).

Task 7.0 Perform Project Coordination and Management

C&C will be involved in agency and public coordination pertaining to the preparation of this EA/EIE, including consultation with the TOA, CTDOT, FHWA, CEPA, and various federal, state, and local resource agencies, coordination for a formal Public Hearing, and project management related coordination.

Subtask 7.1 TOA, CTDOT, and Agency Coordination

- a) C&C will coordinate and discuss project issues (EA/EIE development, schedule, etc.) with the TOA, CTDOT, FHWA and various resource agencies over the duration of the study.
- b) A total of sixteen (16) meetings (including the Kickoff Meeting) will be held with the TOA, specifically for project management briefings and client coordination. It is assumed that ten (10) of these can occur on the same day as the coordination meetings with agencies to avoid extra travel time. Six (6) of these will require travel to the Town of Avon.
- c) A total of ten (10) coordination meetings with CTDOT and resource agencies are assumed, specifically for the purpose of coordinating with the work efforts of CTDOT, reviewing draft materials, reviewing draft comments and responses. A total of 16 hours will be allocated for each coordination meeting, which includes travel time and attendance at each meeting by two

of the C&C staff as well as preparation and distribution of meeting notes. This overall coordination task also includes time for developing and coordinating schedules associated with the NEPA/CEPA process.

Subtask 7.2 Community Outreach and Public Hearing

7.2.1 Community Outreach

Due to the high profile nature of the project and the diversity of engaged stakeholders, this environmental assessment process will include a clear sequential set of community outreach and public involvement activities. The goal will be to achieve transparency in the environmental evaluation and project design process that offers opportunities for stakeholder input at key milestones. In order to accomplish this, the following tasks will be conducted:

- a) *Public Workshops* FHI will conduct up to two interactive workshops that provide ample opportunity for members of the public to join in the dialogue about the Old Farms Road project. As part of the early public outreach process, FHI will conduct an interactive workshop to discuss issues and assets, and gain feedback on concepts for the roadway. The activities, format, and supporting materials for the public workshop will be based on an agenda developed jointly by the TOA and FHI. The agenda is anticipated to include an open house with display boards about the project, a brief presentation and facilitated discussion.

FHI will prepare and present materials for use in these meetings and presentations. The presentation of ideas and issues will be geared to both technical and non-technical audiences. Materials will include visuals in a graphically-rich format and written information as presentation aids. Information will be communicated using "PowerPoint" presentations along with presentation boards, as well as printed "leave-behinds" utilizing both graphics and text as appropriate.

- b) Prior to the public hearing for the project, a second public workshop will be held to obtain input and feedback on the environmental findings and proposed mitigation.

FHI will collaborate with the Town to publicize the meetings and provide handout materials.

- c) Supporting outreach efforts will be essential to the success of the project's transparency in the eyes of the community. FHI will use opportunities to use a variety of social media (e.g. Survey Monkey, Twitter, Facebook, etc.) and conventional publicity to encourage participation and inform the community about the environmental evaluation, the project alternatives,

and project progress. FHI will work with the TOA collaboratively to publicize the study progress, starting with the following options:

- d) Develop a distribution list composed of targeted stakeholders and community groups for outreach. These contacts will be utilized for e-mail distribution of study progress reports and notices of meetings.
- e) FHI will develop content for the study webpage on the Town website that will include an overview of the project, project schedule, frequently asked questions (FAQ), study documents/reports/maps from major project milestones, and provide contact information for submitting comments on the project and its progress. As part of this process, we will establish, with the Town, a protocol for responding to comments received.
- f) FHI will develop up to three press releases during the project to announce milestones through local media including the draft environment assessment availability, and notification of each public meeting.

7.2.2 Public Hearing

During the public comment period, it is anticipated that one (1) public hearing will be held for this project. It is assumed that the TOA will schedule the public hearing and secure an appropriate public hearing site and facilities. C&C will provide the following services in support of the public hearing:

- a) Meet with TOA and CTDOT representatives to determine the approach, objectives, format, and materials for the hearing. One (1) meeting is assumed, plus one (1) "dry run" meeting at least one week prior to the Public Hearing. Materials to be presented to the public will be reviewed by the TOA and CTDOT at this time.
- b) Prepare materials for distribution to the public that will provide an overview of the project. Up to fifty (50) copies of this handout will be prepared for distribution to the public at the hearing.
- c) Prepare 2-foot x 3-foot color boards, slides, and/or MS PowerPoint presentation (MS Office Professional 2003 version) materials as appropriate. Assume a maximum of ten (10) 2-foot x 3-foot boards to be prepared for the "open house" portion of the public hearing.
- d) Attend the public hearing, make the presentation, and participate in discussions of the project at the hearing.
- e) Develop and provide copies of a meeting agenda, sign-in sheet, and comment forms and supply pencils for use by the public at the hearing.

- f) Compile written public comments made at the hearing for delivery to the TOA for inclusion in the public record. Public comments will be summarized and addressed in the Final EA/EIE.

This scope does not include transcription services for the public hearing. The TOA will provide C&C with a transcript of all verbal comments recorded at the public hearing.

The scope does not include translation services (of oral presentations or meeting materials) for the public hearing. Should those services be required, a supplemental scope will be prepared and negotiated between the TOA and C&C.

-END OF SCOPE OF WORK-